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**THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Consumer Financial Protection Bureau,)
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Plaintiff,)
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v.) Civil Action No. 3:CV-17-00101
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Navient Corporation, *et al.*,)
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Defendants.)

**DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL
CERTAIN EXHIBITS TO THE STATEMENT OF UNDISPUTED
MATERIAL FACTS IN SUPPORT OF DEFENDANTS'
MOTION FOR PARTIAL SUMMARY JUDGMENT**

In accordance with Local Rule 5.8, Local Criminal Rule 49, and Paragraph 11 of the Court's Confidentiality Agreement and Protective Order (Doc. 66-1), Defendants Navient Corporation and Navient Solutions, LLC hereby submit this Motion for Leave to File under Seal Certain Exhibits to the Statement of Undisputed Material Facts in Support of Defendants' Motion for Partial Summary Judgment. Pursuant to Local Criminal Rule 49, Defendants submit the following materials on paper to the Clerk's Office in support of this motion:

- a. the documents for which the sealing order is sought;
- b. a statement of the legal and factual justification for the sealing order that is being sought; and
- c. a proposed form of order granting Defendants' Motion for Leave to File under Seal Certain Exhibits in Support of Defendants' Motion for Partial Summary Judgment.

Defendants respectfully request this Court to grant the instant motion and issue an order sealing Exhibits 3, 11-13, 16, 22, 27, 31, 34-37, 40, 45, 51, 57, 63, 71, and 73-80 to the Statement of Undisputed Material Facts in Support of Defendants' Motion for Partial Summary Judgment.

Dated: January 17, 2019

Respectfully submitted,

/s/ Jonathan E. Paikin

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Pioneer Credit Recovery, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2019, I served the foregoing Defendants' Motion for Leave to File Under Seal Certain Exhibits to the Statement of Undisputed Material Facts in Support of Defendants' Motion for Partial Summary Judgment and the accompanying materials have been served on the CFPB by email to the following counsel for Plaintiff:

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Mr. Jabbour, on behalf of Plaintiff, previously consented to electronic service.

/s/ Karin Dryhurst

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